

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KLICK SOLAR, LLC, a Colorado limited
liability company,

Plaintiff,

v.

NATIONWIDE SECURITY SOLUTIONS,
INC. d/b/a “Nationwide Solar,” an Oregon
corporation,

Defendant.

Case No. 3:23-cv-05766-MLP

STIPULATION AND ~~[PROPOSED]~~
ORDER TO REMAND

NOTE ON MOTION CALENDAR:
SEPTEMBER 6, 2023

Nationwide Security Solutions, Inc., defendant, and Klick Solar, LLC, plaintiff, hereby stipulate, agree, and jointly request that the Court remand this removed action back to the Superior Court of the State of Washington for the County of Clark (“**Clark County Superior Court**”). The parties make this request due to the lack of diversity jurisdiction, based upon the following:

1. On July 27, 2023, Klick Solar, LLC commenced an action in the Clark County Superior Court captioned *Klick Solar, LLC v. Nationwide Solar, LLC*, Cause No. 23-2-01861-06.

2. On August 25, 2023, Nationwide Security Solutions, Inc. filed a Notice of Removal with this Court [ECF No. 1] based on diversity jurisdiction. The action was assigned to the Honorable Michelle L. Peterson as Case No. 3:23-cv-05766-MLP.

3. Klick Solar, LLC and Nationwide Security Solutions, Inc. agree that the requirements of diversity jurisdiction are not met here. This was unknown to defense counsel at the time of filing the Notice of Removal.

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Snell & Wilmer
506 Second Avenue, Suite 1400
Seattle, WA 98104
425.748.5055

1 WHEREFORE, Klick Solar, LLC and Nationwide Security Solutions, Inc. stipulate and
2 agree that this action does not satisfy the requirements for diversity jurisdiction, and, on this basis,
3 jointly request that the Court order this action immediately remanded to the Clark County Superior
4 Court. *See* 28 U.S.C. § 1332.

5 **IT IS SO STIPULATED.**

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7 Dated: September 6, 2023

SNELL & WILMER L.L.P.

8
9 By: /s/ Amit D. Ranade
Amit D. Ranade, WSBA No. 34878

10 By: /s/ Mallory L. B. Satre
11 Mallory L. B. Satre, WSBA No. 50194
12 506 Second Avenue, Suite 1400
13 Seattle, WA 98104
14 Tel: 206.741.1404
aranade@swlaw.com;
msatre@swlaw.com
Attorneys for Defendant

15 Dated: September 6, 2023

JOSEPH WAGNER LAW OFFICE

16
17 By: /s/ Joseph Wagner
18 Joseph Wagner WSBA# 57027
19 Attorney for Plaintiff
1220 Main Street, Suite 400
20 Vancouver, WA 98660
Phone: (360) 597-4173
Email: Joseph@jwagner.legal
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED this 7th day of September, 2023.



MICHELLE L. PETERSON
United States Magistrate Judge

Presented by:

SNELL & WILMER L.L.P.

By: /s/ Amit D. Ranade

Amit D. Ranade, WSBA No, 34878

By: /s/ Mallory L.B. Satre

Mallory L. B. Satre, WSBA No. 50194

506 Second Avenue, Suite 1400

Seattle, WA 98104

Tel: 206.741.1404

aranade@swlaw.com;

msatre@swlaw.com

Attorneys for Defendant

JOSEPH WAGNER LAW OFFICE

By: /s/ Joseph Wagner

Joseph Wagner WSBA# 57027

Attorney for Plaintiff

1220 Main Street, Suite 400

Vancouver, WA 98660

Phone: (360) 597-4173

Email: Joseph@jwagner.legal

Attorneys for Plaintiff

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Snell & Wilmer
506 Second Avenue, Suite 1400
Seattle, WA 98104
425.748.5055